complexities or other exceptional circumstances].

- 7. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York. The following interim deadlines may be extended by the parties on consent without application to the Court, provided the parties meet the fact discovery completion date in ¶ 6 above:
 - a. Initial requests for production of documents to be served by 02/07/2008.
 - b. Interrogatories to be served by OZ/07/2008.
 - c. Depositions to be completed by 04/07/2001.
 - i. Unless the parties agree or the Court so orders, depositions are not to be held until all parties have responded to initial requests for document production.
 - ii. There is no priority in deposition by reason of a party's status as plaintiff or defendant.
 - iii. Unless the parties agree or the Court so orders, non-party depositions shall follow initial party depositions.
 - d. Requests to Admit to be served no later than 04/14/2008.
- 8. All *expert* disclosures, including reports, production of underlying documents and depositions are to be completed by:
 - a. Expert(s) of Plaintiff(s)
 - b. Expert(s) of Defendant(s) 4/21/2008
- 9. All discovery is to be completed no later than \(\frac{\frac{31}{200}}{200} \) \(\frac{5}{16} \) \(\frac{1008}{200} \)
- 10. The Court will schedule a post-discovery status conference (see § 16) within three weeks of the close of all discovery.
- Pre-motion letters regarding dispositive motions, if any, are to be submitted no later than two weeks prior to the post-discovery status conference date listed in § 16. In accord with this Court's Individual Rule 2.A, response letters thereto are to be submitted within three business days from service of the initial pre-motion letter. Premotion Letters to be submitted by \$\frac{16}{2008};
- 12. All counsel must meet for at least one hour to discuss settlement not later than two weeks following the close of fact discovery. Accordingly, Counsel for the parties

have discussed holding a settlement conference before a Magistrate Judge or the Southern District's Mediation Program and request: [check one]

a. Referral to a Magistrate Judge for settlement discussions

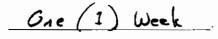
Freeman will Contact the parties by

B. Referral to the Southern District's Mediation Program

Referral to the Southern District's Mediation Program

13. The parties shall submit a Joint Pretrial Order prepared in accordance with the undersigned's Individual Practice Rule 3 and Rule 26(a)(3). If this action is to be tried before a jury, proposed *voir dire*, jury instructions, and a verdict form shall be filed with the Joint Pretrial Order. Counsel are required to meet and confer on jury instructions and verdict form in an effort to make an agreed upon submission.

14. Parties have conferred and their present best estimate of the length of trial is



TO BE COMPLETED BY THE COURT:

15. [Other directions to the parties:]

SO ORDERED.

DATED:

New York, New York

RICHARD J. SULLIVAN

UNITED STATES DISTRICT JUDGE